

# EXHIBIT A

**EXHIBITS IN SUPPORT OF  
EMERGENCY MOTION FOR  
COMPASSIONATE RELEASE**

**FEDERAL PUBLIC DEFENDER**

NORTHERN DISTRICT OF CALIFORNIA  
13TH FLOOR FEDERAL BUILDING - SUITE 1350N  
1301 CLAY STREET  
OAKLAND, CA 94612

**STEVEN G. KALAR**  
*Federal Public Defender*  
**JOYCE LEAVITT**  
*Assistant Federal Public Defender*

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May 18, 2020

Ms. Christine Hilliard – *via email and US Mail*  
RRM Sacramento  
RESIDENTIAL REENTRY OFFICE  
501 I STREET, SUITE 9-400  
SACRAMENTO, CA 95814  
[chilliard@bop.gov](mailto:chilliard@bop.gov)

cc, *via email*:  
Dominic Ayotte  
Deputy Regional Counsel/WXRO CLC Supervisor  
[cayotte@bop.gov](mailto:cayotte@bop.gov)

**RE: Quincy Krashna, Federal Register No. # 24074-111**

Dear Ms. Hilliard:

I am writing to ask request that Mr. Krashna be transferred to Home Confinement or immediate Compassionate Release. Mr. Krashna has a number of risk factors, which alone and in combination place him at risk for severe complications of COVID-19, including a serious heart condition (congestive heart failure), hypertension, and a history of smoking. He also has high blood pressure. The conditions were verified in Mr. Krashna's presentence report dated August 21, 2018 ("PSR"), which was sent to the Bureau of Prisons (BOP) at the time that he self-surrendered to serve his sentence. The PSR includes confirmation from Mr. Krashna's treating doctor that he had suffered two prior heart attacks in 2004 and 2005 with stint replacements, and had a history of transient mini strokes, as well as hypertension, chronic pain and he uses marijuana to aid in sleep and pain management. *See PSR at ¶¶ 70, 73.*

According to information obtained from the BOP, Mr. Krashna is classified as a "Care Level 2" inmate, which means he is stable with chronic care issues. However, since he was returned to Santa Rita Jail from home detention in early 2020, Mr. Krashna has had ongoing medical complications relative to his chronic conditions. Records obtained from Santa Rita Jail demonstrate that Mr. Krashna has been seen by medical staff there continuously since January, 2020, for ongoing chest pains, shortness of breath, and arm pain. In late March 25, 2020, a medical doctor assessed Mr. Krashna as potentially experiencing a coronary artery spasm and placed him on different medications for high blood pressure and coronary artery disease, as well

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as a medication for chest pain. His condition has not resolved and his medical conditions make him extremely vulnerable. He also has chronic nerve damage.

Because of his medical condition, I am requesting that you transfer Mr. Krashna to home confinement pursuant to § 12003(b)(2) of the CARES Act, and the Attorney General's April 3, 2020, Memorandum finding the COVID-19 emergency conditions are materially affecting the functioning of the Bureau of Prisons. Mr. Krashna is close to the end of his sentence with a projected release date, according to the BOP, of September 5, 2020. He is medically at risk, and transferring Mr. Krashna to home detention will decrease the population at Santa Rita Jail without endangering the greater community. Alternatively, for the same reasons, immediate Compassionate Release is requested. 18 U.S.C. § 3582( c)(1)(A).

I have spoken with Hari Krashna, Mr. Krashna's mother. She may be reached at (510) 932-9385. The release plan is for Mr. Krashna to live at his own apartment which is located at 700 Calhoun Ave, Albany, CA 94706. This apartment has a long term lease and the rent has been paid through November. Alternatively, according to Hari Krashna, her son could live with her. Hari Krashna has a residence in Richmond, California, but is currently working in Los Angeles. However, she is willing to work out whatever is needed to ensure that her son could be released from Santa Rita Jail on home detention.

Sincerely,

STEVEN G. KALAR  
Federal Public Defender  
Northern District of California

/S/

JOYCE LEAVITT  
Assistant Federal Public Defender

# **EXHIBIT B –**

## **FILED UNDER SEAL**

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